

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

AON PLC and AON GROUP, INC., AON
CONSULTING

Plaintiffs,

v.

INFINITE EQUITY, INC., TERRY
ADAMSON, JON BURG, DANIEL
COLEMAN, ELIZABETH STOUTDT, and
TYLER EVANS, CHRISTOPHER
DiDOMENICO

Defendants.

Case No. 1:19-cv-07504

DECLARATION OF RONALD S. SCHNELL

I, Ronald S. Schnell, declare as follows:

1. I was retained by counsel for Plaintiffs Aon plc and Aon Group, Inc. as an expert in the field of computer science and software development, to provide technical analysis and expert opinions in the above-captioned action.

2. A description of my expertise and experience are set forth in a sworn Declaration authored by me and filed on April 9, 2020 (Dkt. 82). I incorporate my expertise and experience from that Declaration herein, by reference.

3. At the request of Defendants, I testified at a deposition on August 5, 2020. At that deposition, I was asked about “specific examples” of source code with “identical syntax” that are in addition to the examples given in my expert report served to Defendants on May 20, 2020.

4. However, Defendants did not have the source code available for me to use to refer to any additional specific examples, and from my expertise in source code, computer science and software, it is not possible to show examples within source code without the source code to show.

5. If Defendants had introduced source code at my deposition, I could have shown additional examples of identical syntax between PeerTracker and MyPerformanceAwards.

6. [REDACTED]
[REDACTED]
[REDACTED]

7. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

8. I was not given the MyPerformanceRewards version of the file that existed prior to June 2, 2019, although I know from my examination of the source code control system metadata that it existed at Infinite prior to this date.

9. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10. [REDACTED]
[REDACTED]
[REDACTED]

16. There are numerous additional examples of identical syntax in the source code.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 17, 2020 at Weston,
Florida.



Ronald S. Schnell

EXHIBIT A



